

Oregon State University Seafood Laboratory

OSU Surimi Technology School

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Date: April 28, 1999

To: Dockets Management Branch (HFA-305),
FDA, 5630 Fishers Kane, Room 1061,
Rockville, MD 20852

Re: NFI's request on disjunctive labeling

Dear Sir/Madam

I am writing this letter to ask you to approve the NFI's request on disjunctive labeling for surimi seafoods.

I have 15 years of industry and academic experience in the US surimi and surimi seafoods. As a founder of the annual OSU Surimi Technology School (Astoria, OR), I have been teaching science and technology in surimi and surimi seafoods along with products and marketing. Two major problems in the US surimi seafood industry are the current FDA regulations which do: 1) require the use of the word "imitation" on the package and 2) not allow the manufacturer to use disjunctive labeling. Every country around the world does not have these two regulations for their industry. Therefore the US industry has a significant disadvantage in world trades of surimi seafoods. Last year our neighbor country Canada approved the removal of "imitation" from the package.

Let me give you an example to explain why we need the approval of the disjunctive labeling. When pollock surimi 50%, water 30%, and other ingredients 20% are used in a surimi seafood recipe, the ingredient legend should read "pollock, water, and other ingredients". When whiting replaces 1/2 of the pollock, a new recipe would contain pollock 25%, whiting 25%, water 30%, and other ingredients 20%. According to the current regulations, it is labeled as water, pollock, whiting, and other ingredients. Water is the #1 ingredient! This is why we need to get approval for disjunctive labeling. In addition, since pollock and whiting are available at different time of the year, the industry will save money on inventory if they have the ability to adjust fish ingredients based on the availability. This will also make the industry not to keep multiple labels for the same item resulting in another savings for the industry. This disjunctive labeling will not mislead our consumers nor cause a possible safety related problem.

I would like to make additional comments for the use of disjunctive labeling. I would believe there is a couple of options:

- 1) Fish protein (may contain one or more of the following: pollock, whiting, and/or cod)
- 2) Fish (may contain one or more of the following: pollock, whiting, and/or cod)

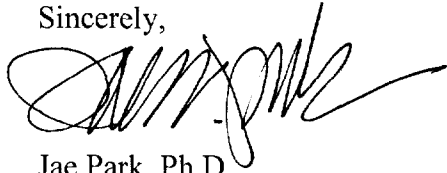
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In the best interest of the industry, the use of "fish" (rather than "fish protein") may be the best. This is what other countries use for the labeling of surimi from multiple species.

Thank you for your positive consideration toward the NFI's request. I believe your decision will make a difference for the US surimi seafood industry.

Sincerely,

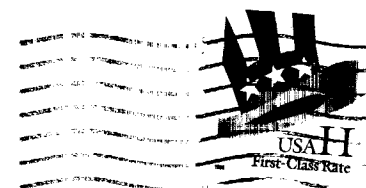
A handwritten signature in black ink, appearing to read 'Jae Park', with a stylized flourish extending to the right.

Jae Park, Ph.D.

Associate Professor

Oregon State University Surimi School

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